

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
NEIL A.F. POPOVIĆ, Cal. Bar No. 132403
ANNA S. McLEAN, Cal. Bar No. 142233
TENAYA RODEWALD, Cal. Bar No. 248563
JOY O. SIU, Cal. Bar No. 307610
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: 415.434.9100
Facsimile: 415.434.3947
Email: npopovic@sheppardmullin.com
amclean@sheppardmullin.com
trodewald@sheppardmullin.com
jsiu@sheppardmullin.com

Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 | IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE THE MARCH 15,
2019 CASE MANAGEMENT
CONFERENCE AND EXTEND THE
DEADLINE TO FILE A JOINT CASE
MANAGEMENT STATEMENT**

24 This Joint Stipulation is made by and between Plaintiffs and Seagate Technology LLC
25 (“Seagate,” and together with Plaintiffs, the “Parties”), by and through their respective
26 undersigned counsel of record, with reference to the following facts:

RECITALS

1. WHEREAS, Plaintiffs filed a renewed motion for class certification (“Motion”) on October 15, 2018 (Dkt. 189);

2. WHEREAS, the Court denied Plaintiffs' Motion on January 22, 2019 (Dkt. 200);

3. WHEREAS, the Court instructed the parties “to meet and confer regarding a plan to resolve or try Plaintiffs’ individual claims.”

4. WHEREAS the Court had ordered the parties to file a joint case management statement (“Joint CMC Statement”) no later than February 22, 2019 (*id.*);

9 5. WHEREAS, the Court had further ordered that a case management conference
10 ("CMC") be held on March 1, 2019 at 2:00 pm (*id.*);

11 6. WHEREAS, on February 21, 2019, pursuant to a stipulation of the Parties, the
12 Court ordered that the CMC be continued until March 15, 2019 at 2:00 pm and the deadline for the
13 parties to file the Joint CMC Statement be extended until March 8, 2019 (Dkt. 210);

14 7. WHEREAS the parties are working diligently to negotiate a potential resolution of
15 Plaintiffs' individual claims, and therefore require additional time to prepare and submit the Joint
16 CMC Statement and prepare for the CMC;

17 8. WHEREAS, the Parties have agreed, subject to the Court's approval and
18 availability, that the CMC be continued until March 29, 2019, or the earliest available date
19 thereafter; and

20 9. WHEREAS, the Parties have agreed, subject to the Court's approval, that the
21 deadline to file the Joint CMC Statement be extended until March 22, 2019.

STIPULATION

23 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
24 BETWEEN THE PARTIES that, subject to the Court's approval and availability:

25 (1) the Case Management Conference presently calendared for March 15, 2019 at 2:00 pm
26 be continued until March 29, 2019 at 2:00 pm; and

27 (2) the deadline for the parties to file a joint case management statement be extended until
28 March 22, 2019.

Dated: March 7, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____
/s/ Neil A.F. Popović
NEIL A.F. POPOVIĆ

Attorneys for Defendant
SEAGATE TECHNOLOGY LLC

I, Neil A.F. Popović, whose user ID and password are used to efile this document, hereby attests that, pursuant to Local Rule 5.1(i)(3), concurrence in this filing was obtained from each of the other Signatories, in lieu of each's signature.

Dated: March 7, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

By _____
/s/
STEVE W. BERMAN

Attorneys for Plaintiffs

Dated: March 7, 2019

AXLER GOLDICH LLC

By _____
/s/
MARC A. GOLDICH (*Pro Hac Vice*)

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 12, 2019

The Honorable Joseph C. Spero
Chief Magistrate Judge

